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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA

BY _____

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11 Attorneys for Plaintiff, Mavrix Photographs LLC

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

By Fax

14 MAVRIX PHOTOGRAPHS LLC, a limited
15 liability company,

16 Plaintiff,

17 v.

18 TOWNSQUARE MEDIA, LLC; and DOES
19 1-20 INCLUSIVE,

20 Defendants.

Case No. **SACV13-01977 RNB**

**COMPLAINT FOR DIRECT,
CONTRIBUTORY, INDUCEMENT,
AND VICARIOUS COPYRIGHT
INFRINGEMENT OF
PHOTOGRAPHS OF KATY PERRY**

DEMAND FOR JURY TRIAL

21 Mavrix Photographs, LLC ("Mavrix"), by and through their attorneys of record,
22 complains against Townsquare Media, LLC ("Townsquare"), a Delaware limited liability
23 company; and DOES 1 through 20 (collectively, "Defendants") as follows:

24 **JURISDICTION AND VENUE**

25 1. This is a civil action against Defendants for copyright infringement in breach
26 of the United States Copyright Act, 17 U.S.C. §§ 101 *et seq.* This Court has subject matter
27 jurisdiction over the copyright infringement under 28 U.S.C. § 1331, 17 U.S.C. § 501(a),
28 and 28 U.S.C. § 1338(a) and (b).

2. Venue is proper in this District under 28 U.S.C. §§ 1391(b) and (c) and 28 U.S.C. § 1400(a) in that the claim arises in this Judicial District, the Defendants may be found and transact business in this Judicial District, and Defendants have contractually waived the right to challenge jurisdiction in this Judicial District. Defendants are subject to the general and specific personal jurisdiction of this Court because of their general contacts with the State of California.

PARTIES

3. Plaintiff Mavrix is a limited liability company incorporated and existing under the laws of California, with a principal place of business located in Orange County, California.

4. Defendant Townsquare is a limited liability company incorporated and existing under the laws of Delaware. Townsquare is a major, national media, pop-culture and radio station company, with its principal place of business in Connecticut.

5. The true names or capacities, whether individual, corporate or otherwise, of the Defendants named herein as DOES 1 through 20, inclusive, are unknown to Plaintiff, who therefore sues said Defendants by such fictitious names, and will ask leave of Court to amend this Complaint and insert the true names and capacities when ascertained.

6. Plaintiff is informed and believes and, upon such, alleges that each of the Defendants designated herein as a “DOE” is legally responsible in some manner for the events and happenings herein alleged, and that Plaintiff’s damages as alleged herein were proximately caused by such Defendants. Plaintiff believes that some of the DOE defendants are partial owners of Townsquare, or contribute heavily to Townsquare’s content, and are personally liable for Townsquare’s copyright infringement.

//

//

//

FACTS COMMON TO ALL COUNTS

7. Mavrix Photo, Inc. (“MPI”) is a prominent celebrity photography agency based in Los Angeles. MPI licenses its photographs to its end customers, often popular publications like People or US Weekly.

8. Townsquare owns the website www.bozemankissfm.com (“Website”), which is a website that supports one of Townsquare’s media holdings, including the 96.7 Kiss FM radio station.

9. Despite having no permission, consent, or license to do so, Townsquare has for commercial gain and purpose reproduced, publicly distributed, and publicly displayed—as well as made available specifically for third party’s download, display and public and private sharing—certain original photographs of superstar singer Katy Perry (the “Perry Photos”) belonging to Mavrix. Mavrix acquired all right, title and interest to the Perry Photos from MPI by way of a full assignment of all such rights, which previously were owned solely by MPI.

10. True and correct copies of the copyright registration certificate for the Perry Photos, and evidence of their infringement by the Defendants, are attached as **Exhibit “1”**.

FIRST CLAIM FOR RELIEF

(Copyright Infringement, 17 U.S.C. § 501)

11. Plaintiff Mavrix incorporates here by reference the allegations in paragraphs 1 through 10 above.

12. Mavrix is the owner of all rights, title and interest in the copyrights to the Perry Photos, which substantially consist of material wholly original with Plaintiff and which are copyright subject matter under the laws of the United States. Mavrix has complied in all respects with the Copyright Act and all of the laws of the United States governing copyrights. The Perry Photos have been timely (specifically for purposes of

1 Plaintiff's recovery of attorneys' fees and statutory damages) registered with the United
2 States Copyright Office.

3 13. Defendants have directly, vicariously and/or contributorily infringed, and
4 unless enjoined, will continue to infringe Mavrix's copyrights by reproducing, displaying,
5 distributing and utilizing the Photos for purposes of trade violation of 17 U.S.C. § 501 *et*
6 *seq.*, and still further by providing the public with the means to further "share" the photos
7 via social media platforms as seen in Exhibit 1 at their website.

8 14. Defendants have willfully infringed, and unless enjoined, will continue to
9 infringe Mavrix's copyrights by reproducing, displaying, distributing and utilizing the
10 Photos for purposes of trade, and still further by providing the public with the means to
11 further "share" the photos via social media platforms as seen in Exhibit 1, which acts
12 Defendants knew were prohibited by virtue of their additional posting and linking to a site
13 that contains the full photo set. The brazen willfulness is seen when one goes to the site
14 that defendant took the picture from (and then also links to), which site is
15 www.hotcelebshome.com, and which defendant links to on its www.bozemankissfm.com
16 site (thereby further encouraging the illegal download and public viewing of *all* the Katy
17 Perry photos which exist at the linked-to site), a site itself that is an obviously unlicensed
18 site, does not even purport to own the photos, and the owner of the site purports to be a guy
19 in the Netherlands. Likewise, Defendants put the tag "celebrity paradise" on their website
20 under Mavrix's Perry Photo (which was also placed under all the photos at the also-
21 infringing www.hotcelebshome.com site), but the website "www.celebrity-paradise.com" is
22 a foreign, German website with celebrity content, and which to any reasonable person it is
23 obvious it too is not the owner or licensee of the Perry Photos, and indeed does not even
24 purport to be the owner. This behavior demonstrates willful infringement and certainly
25 reckless disregard of Mavrix's rights under the governing Ninth Circuit standard from the
26 seminal Ninth Circuit *Louis Vuitton* case.

15. Defendants have received substantial benefits in connection with the unauthorized reproduction, display, distribution and utilization of the Perry Photos for purposes of trade, including by increasing the traffic to their website and through the social media functions users can utilize.

16. All of the Defendants' acts are and were performed without the permission, license or consent of Mavrix.

17. As a result of the acts of Defendants alleged herein, Mavrix has suffered and is suffering substantial damage to its business in the form of diversion of trade, loss of profits, injury to goodwill and reputation, and the dilution of the value of its rights, all of which are not yet fully ascertainable.

18. Because of the willful nature of the copyright infringement, Mavrix is entitled to an award of statutory damages of up to \$150,000 per willfully infringed photograph as well as its attorney's fees in prosecuting this action. If other infringements are discovered in this case, this pleading will be augmented accordingly or notice of additional infringements will be otherwise filed and served in the case.

19. The said wrongful acts of Defendants have caused, and are causing, injury to Mavrix, and unless this Court restrains Defendants from further commission of said acts, Mavrix will suffer irreparable injury, for all of which it is without an adequate remedy at law.

20. The full scope of infringement of other works of Mavrix is currently unknown, and discovery will require access to and analysis of the entire database and library of all content of Defendants so it may be searched with image-based search tools for other Mavrix works. Accordingly, Defendants are hereby placed on notice not to destroy or delete any content or material on any of its servers for any domain names and to otherwise preserve all evidence.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests judgment against Defendants as follows:

1. The Defendants, their officers, agents, servants, employees, representatives, and attorneys, and all person in active concert or participation with them, be permanently enjoined from designing, copying, reproducing, displaying, promoting, advertising, distributing, linking-to, or selling, or any other form of dealing or transaction in, any and all advertising and promotional materials, print media, signs, Internet web sites, or any other media, either now known or hereafter devised, bearing any design or mark which infringe, contributorily infringe, or vicariously infringe upon Plaintiff Mavrix's rights in the Photos.
2. Defendants be held liable to Plaintiff in statutory damages for copyright infringement, including willful infringement, in accordance with 17 U.S.C. §§ 504(a)(2) & (c) and for costs, interest and reasonable attorney's fees under 17 U.S.C. § 505. This includes statutory damages of \$150,000 for the infringement of the Perry Photo at www.bozemankissfm.com. It also includes a further statutory damages award for the unlawful public display of all 29 photos at the site www.hotcelebshome.com, which latter website Defendant encourages people to go to—expressly by links—so as to view all the Mavrix-owned photos of Katy Perry, which statutory damages award amounts to an additional \$4,350,000 (29x\$150,000).
3. An accounting be made for all profits, income, receipts or other benefit derived by Defendants from the reproduction, copying, display, promotion, distribution or sale of products and services, or other media, either now known or hereafter devised, that improperly or unlawfully infringes upon Plaintiff's copyrights pursuant to 17 U.S.C. §§ 504 (a)(1) & (b).
4. Requiring Defendants to account for and pay over to Plaintiff all profits derived by Defendants from their acts of copyright infringement and to reimburse Plaintiff for all

1 damages suffered by Plaintiff by reasons of Defendant's acts, pursuant to 17 U.S.C. §§ 504
2 (a)(1) & (b).

3 5. Actual damages for copyright infringement pursuant to 17 U.S.C. §§ 504 (a)(1) &
4 (b).

5 6. That Plaintiff be awarded any such other and further relief as the Court may deem
6 just and appropriate

7
8 Dated: December 18, 2013

ONE LLP

9
10 By:  /s/ Peter Afrasiabi

Peter R. Afrasiabi, Esq.

John Tehranian, Esq.

Attorneys for Plaintiff,

Mavrix Photographs LLC

DEMAND FOR JURY TRIAL

Plaintiff Mavrix Photographs LLC hereby demands trial by jury of all issues so triable under the law.

Dated: December 18, 2013

ONE LLP

By:  /s/ Peter Afrasiabi

Peter R. Afrasiabi, Esq.

John Tehranian, Esq.

Attorneys for Plaintiff,

Mavrix Photographs LLC

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
VA 1-788-833

Effective date of
registration:
August 31, 2011

Title

Title of Work: Katy Perry Pink Bikini Miami Shot On 06/21/2011.

Completion/Publication

Year of Completion: 2011

Date of 1st Publication: June 21, 2011

Nation of 1st Publication: United States

Author

■ Author: Moises Naveira

Author Created: photograph(s)

Work made for hire: No

Citizen of: United States

Domiciled in: United States

Copyright claimant

Copyright Claimant: Mavrix Photo Inc

195 SE 4th Avenue, Deerfield Beach, FL, 33441, United States

Transfer Statement: By written agreement

Rights and Permissions

Organization Name: Mavrix Photo Inc

Name: Gareth Miles Thomas

Email: gareth@mavrixphoto.com

Telephone: 305-542-9276

Address: 195 SE 4th Avenue

Deerfield Beach, FL 33441 United States

Certification

Name: Gareth Thomas

Date: August 31, 2011

FAXED 10/12/11 ✓

Registration #: VA0001788833

Service Request #: 1-655230912



Mavrix Photo Inc
Gareth Miles Thomas
195 SE 4th Avenue
Deerfield Beach, FL 33441 United States

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Learn More

Katy Perry And Her Pink Bikini [Photos]

By 96.7 Kiss FM June 28, 2011 10:01 AM



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Celebrity Paradise

Being a celebrity, you've always gotta be on the lookout for the paparazzi if you don't want to be seen. In Katy Perry's case, I think she is more than fine with millions of people seeing her in her pink bikini.

See all the photos of Katy Perry's high quality black polka dotted pink bikini shots [here](#)

Filed Under: bikini, katy perry
 Category: Entertainment News, Photos



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 'Here's to the Losers' Tribute Song [VIDEO]
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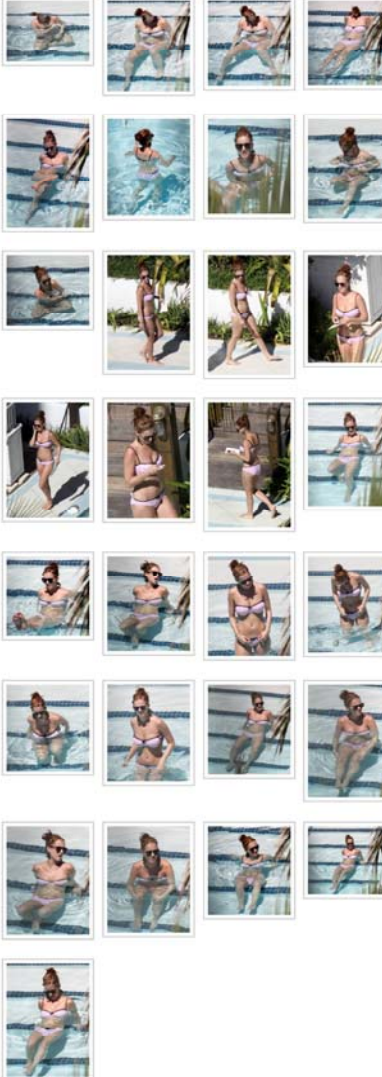
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Nina Agdal BootySlip

Jennifer Aniston's Nipples

Rihanna's Sexy GQ Photoshoot

Emily Ratajkowski's Topless Photoshoot

Serena Gomez in Bikini

Candice Swanepoel's Fantasy Bra

Helen Flanagan Naked in Nuts

Emily Ratajkowski's Sexy GQ Photoshoot

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

I. (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) Maverx Photographs LLC	DEFENDANTS (Check box if you are representing yourself <input type="checkbox"/>) Townsquare Media LLC, Does 1-20
(b) County of Residence of First Listed Plaintiff <u>Orange</u> <small>(EXCEPT IN U.S. PLAINTIFF CASES)</small>	County of Residence of First Listed Defendant <u>Connecticut</u> <small>(IN U.S. PLAINTIFF CASES ONLY)</small>
(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information. Peter Afsharabi 192536, One LLP, 4000 MacArthur Blvd, Suite 500, East Tower, Newport Beach, CA 92660, 949-502-2877	

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1. U.S. Government Plaintiff <input type="checkbox"/> 2. U.S. Government Defendant <input checked="" type="checkbox"/> 3. Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 4. Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only <small>(Place an X in one box for plaintiff and one for defendant)</small> <table style="width:100%;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:10%;">PTF <input checked="" type="checkbox"/> 1</td> <td style="width:10%;">DEF <input type="checkbox"/> 1</td> <td style="width:33%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%;">PTF <input type="checkbox"/> 4</td> <td style="width:10%;">DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td>PTF <input type="checkbox"/> 2</td> <td>DEF <input checked="" type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td>PTF <input type="checkbox"/> 5</td> <td>DEF <input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>PTF <input type="checkbox"/> 3</td> <td>DEF <input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td>PTF <input type="checkbox"/> 6</td> <td>DEF <input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF <input checked="" type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4	Citizen of Another State	PTF <input type="checkbox"/> 2	DEF <input checked="" type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF <input type="checkbox"/> 5	DEF <input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6
Citizen of This State	PTF <input checked="" type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4														
Citizen of Another State	PTF <input type="checkbox"/> 2	DEF <input checked="" type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF <input type="checkbox"/> 5	DEF <input type="checkbox"/> 5														
Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6														

IV. ORIGIN (Place an X in one box only.)

<input checked="" type="checkbox"/> 1. Original Proceeding	<input type="checkbox"/> 2. Removed from State Court	<input type="checkbox"/> 3. Remanded from Appellate Court	<input type="checkbox"/> 4. Reinstated or Reopened	<input type="checkbox"/> 5. Transferred from Another District (Specify)	<input type="checkbox"/> 6. Multi-District Litigation
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V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check "Yes" only if demanded in complaint.)

CLASS ACTION under F.R.Cv.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT:** \$ TBD

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 Copyright infringement, direct, contributory, vicarious, inducement

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 463 Alien Detainee	<input checked="" type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 290 All Other Real Property	TORTS	<input type="checkbox"/> 530 General	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 140 Negotiable Instrument	PERSONAL INJURY	PERSONAL PROPERTY	<input type="checkbox"/> 535 Death Penalty	SOCIAL SECURITY
<input type="checkbox"/> 450 Commerce/ECC Rates, Etc.	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	Other	<input type="checkbox"/> 861 HIA (1395H)
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 863 DIWC (DIWW (406 (g))
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 490 Cable Sat TV	<input type="checkbox"/> 160 Stockholders Suits	<input type="checkbox"/> 340 Marine	BANKRUPTCY	<input type="checkbox"/> 560 Civil Detainee Conditions of Confinement	<input type="checkbox"/> 865 ASI (405 (g))
<input type="checkbox"/> 890 Securities Commodities/Exchange	<input type="checkbox"/> 161 Other Contract	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 472 Appeal 28 USC 158	FORFEITURE/PENALTY	FEDERAL TAX SUITS
<input type="checkbox"/> 895 Other Statutory Actions	<input type="checkbox"/> 190 Franchise	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 473 Withdrawal 28 USC 157	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 898 Agricultural Acts	REAL PROPERTY	<input type="checkbox"/> 355 Motor Vehicle Product Liability	CIVIL RIGHTS	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 899 Environmental Matters	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 440 Other Civil Rights	LABOR	
<input type="checkbox"/> 850 Freedom of Info Act	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 710 Fair Labor Standards Act	
<input type="checkbox"/> 896 Arbitration	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 442 Housing/Accommodations	<input type="checkbox"/> 720 Labor Mgmt. Relations	
<input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision		<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 443 Employment	<input type="checkbox"/> 740 Railway Labor Act	
<input type="checkbox"/> 900 Constitutionality of State Statutes		<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 750 Family and Medical Leave Act	
			<input type="checkbox"/> 446 American with Disabilities-Other	<input type="checkbox"/> 790 Other Labor Litigation	
			<input type="checkbox"/> 448 Education	<input type="checkbox"/> 791 Employee Ret. Inc. Security Act	

FOR OFFICE USE ONLY: Case Number

SACV13-01977 RNB

CV-71 (11/13)

CIVIL COVER SHEET

Page 1 of 3

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will most likely be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

Question A: Was this case removed from state court? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	STATE CASE WAS PENDING IN THE COUNTY OF:		INITIAL DIVISION IN CACD IS:
	<input type="checkbox"/> Los Angeles		Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo		Western
	<input type="checkbox"/> Orange		Southern
	<input type="checkbox"/> Riverside or San Bernardino		Eastern

Question B: Is the United States, or one of its agencies or employees, a party to this action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question C. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	If the United States, or one of its agencies or employees, is a party, is it:			INITIAL DIVISION IN CACD IS:
	A PLAINTIFF?		A DEFENDANT?	
	Then check the box below for the county in which the majority of DEFENDANTS reside.		Then check the box below for the county in which the majority of PLAINTIFFS reside.	
	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Los Angeles	Western	
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western	
	<input type="checkbox"/> Orange	<input type="checkbox"/> Orange	Southern	
	<input type="checkbox"/> Riverside or San Bernardino	<input type="checkbox"/> Riverside or San Bernardino	Eastern	
<input type="checkbox"/> Other	<input type="checkbox"/> Other	Western		

Question C: Location of plaintiffs, defendants, and claims? (Make only one selection per row)	A. Los Angeles County	B. Ventura, Santa Barbara, or San Luis Obispo Counties	C. Orange County	D. Riverside or San Bernardino Counties	E. Outside the Central District of California	F. Other
Indicate the location in which a majority of plaintiffs reside.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of defendants reside.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of claims arose.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

C.1. Is either of the following true? If so, check the one that applies:

- ☒ 2 or more answers in Column C
☐ only 1 answer in Column C and no answers in Column D

Your case will initially be assigned to the
SOUTHERN DIVISION.

Enter "Southern" in response to Question D, below.

If none applies, answer question C.2 to the right. →

C.2. Is either of the following true? If so, check the one that applies:

- ☐ 2 or more answers in Column D
☐ only 1 answer in Column D and no answers in Column C

Your case will initially be assigned to the
EASTERN DIVISION.

Enter "Eastern" in response to Question D, below.

If none applies, go to the box below. ↓

Your case will initially be assigned to the
WESTERN DIVISION.
Enter "Western" in response to Question D below.

Question D: Initial Division?	INITIAL DIVISION IN CACD
Enter the initial division determined by Question A, B, or C above. →	Southern Division

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

IX(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ NO ☐ YES

If yes, list case number(s): _____

IX(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ NO ☐ YES

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**X. SIGNATURE OF ATTORNEY
(OR SELF-REPRESENTED LITIGANT):**

DATE: 12-18-13

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1395ff(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))